

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LANESBOROUGH 2000, LLC, :
Petitioner/Cross-Respondent, :
: 1:23-cv-07584-PKC
: 1
-against- :
: 2
NEXTRES, LLC, :
: 3
Respondent/Cross-Petitioner. :
: 4
-----X

**PETITIONER'S NOTICE OF OBJECTION TO AND MOTION TO
QUASH EXEMPTION CLAIM FORM OF DEFENDANT NEXTRES, LLC**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the declaration of John R. Keough, dated May 8, 2025, and all the prior pleadings and proceedings herein, Petitioner Lanesborough 2000, LLC, by and through undersigned counsel, will move this Honorable Court, at 500 Pearl Street, Courtroom 11D, New York, New York, 10007, on a date and time to be determined by the Court, for an order to quash the claim of exemption alleged by Defendant Nextres, as set forth in the accompanying Memorandum of Law, and for such other, further and different relief as the Court deems just in the premises.

Dated: New York, New York
May 8, 2025

Respectfully submitted,

3. Letter Motion
at ECF 119 should
be terminated.

/s/ John R. Keough

John R. Keough
CLYDE & CO US LLP
The Chrysler Building
405 Lexington Avenue, 16th Floor
New York, New York 10174
Tel.: (212) 710-3900

Daniel R. Lever (Pro Hac Vice Granted, ECF 14)
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1. The writ of execution
and restraining notice
remain in full force and
effect pending further
order of the Court.

2. Nextres shall respond
to the motion within the
time provided on Rule 6:1(b)
of the local Civil Rules.

SO ORDERED.
JRW/JSD
5-13-2025

Miami, Florida 33131
Tel.: (305) 446-2646

Attorneys for Petitioner Lanesborough 2000, LLC